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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS SUBMISSION
TO SPECIAL MASTER COOPER
REGARDING UBER'S OBLIGATION TO
PRODUCE JACOBS LETTER AND
RELATED DOCUMENTS**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal information in its December 5, 2017 Submission To Special Master Cooper Regarding Uber’s Obligation To Produce Jacobs Letter And Related Documents (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo’s Submission	Portions highlighted in blue	Defendants
Exhibit 1	Entire document	Defendants
Exhibit 2	Entire document	Defendants
Exhibit 3	Portions highlighted in green	Waymo
	Portions highlighted in blue	Defendants
Exhibit 4	Portions highlighted in green	Waymo
Exhibit 5	Portions highlighted in green	Waymo
Exhibit 6	Portions highlighted in green	Waymo
Exhibit 7	Portions highlighted in green	Waymo
Exhibit 10	Portions highlighted in green	Waymo
	Portions highlighted in blue	Defendants
Exhibit 11	Portions highlighted in green	Waymo
Exhibit 13	Portions highlighted in green	Waymo
Exhibit 14	Entire document	Defendants

3. Waymo has filed portions of Waymo’s Submission (highlighted in blue) and exhibits thereto under seal because they contain information that Defendants have designated confidential. Waymo expects Defendants to file one or more declarations in accordance with the Local Rules.

4. In addition, a portion of Waymo’s Submission (highlighted in yellow) quotes a letter submitted to the Court by the United States Attorney, which the Court has held shall remain sealed until at least December 13 at noon. (Dkt. 2307).

5. Waymo's Submission also contains or refers to trade secret and confidential business information, which Waymo seeks to seal. Certain exhibits to Waymo's Submission contain, reference, and/or describe Waymo's asserted trade secrets as well as highly confidential business information. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo's business (Dkt. 25-31). Specifically, Exhibits 4-6, 10, and 13 contain search terms and other materials which reflect or disclose Waymo's asserted trade secrets as well as confidential business plans. Exhibit 7 discusses Waymo's highly confidential business plans, such as relating to potential mergers and/or acquisitions. Exhibit 11 contains the name of individual suppliers for Waymo's autonomous vehicle systems, which Waymo maintains as secret. The public disclosure of this information would give Waymo's competitors access to in-depth descriptions—and analysis—of the functionality of Waymo's autonomous vehicle system. If such information were made public, I understand that Waymo's competitive standing would be significantly harmed. Exhibit 11 also contains the home address of a former Waymo employee. Waymo's request to seal is narrowly tailored to only the confidential information.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on December 11, 2017.

By /s/ Lindsay Cooper
Lindsay Cooper
Attorneys for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven